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June 4, 2021

**Via Email and ECF**The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312Re: *SEC v. Ripple Labs, Inc. et al.*, No. 20-cv-10832 (AT) (S.D.N.Y.)

Dear Judge Torres:

Pursuant to Rule IV(A)(ii) of this Court's Individual Rules, we write on behalf of Christian A. Larsen for leave to file under seal an unredacted copy of Mr. Larsen's Reply Memorandum of Law in Further Support of his Motion to Dismiss the First Amended Complaint (the "Reply Memorandum of Law"). A redacted version of the Reply Memorandum of Law is being filed on the public docket.

The redactions in the Reply Memorandum of Law cover passages quoting and otherwise discussing the substance of three documents that have previously been filed under seal by the parties: two legal memoranda (attached to my declaration in support of

Mr. Larsen's motion to dismiss as Exhibits A and B, and attached to Mr. Tenreiro's declaration in opposition to Mr. Larsen's and Mr. Garlinghouse's motions as Exhibits B and C) and an email that has been designated as Confidential pursuant to the Protective Order in this case (attached to Mr. Tenreiro's declaration as Exhibit E). Mr. Larsen has previously explained why the two legal memoranda should be filed under seal. (*See* ECF No. 104.) As the Court is aware, the SEC has disagreed that the two legal memoranda should be sealed in their entirety. (*See* ECF No. 177.) Nonetheless, we respectfully submit that, given that all of these documents are currently under seal, it is appropriate that the Reply Memorandum of Law be filed under seal insofar as it discusses these documents.

Accordingly, pursuant to Paragraph 15 of the Protective Order and in accordance with Rule IV(A)(ii) of this Court's Individual Rules, Mr. Larsen is contemporaneously herewith filing on ECF (1) a redacted copy of the Reply Memorandum of Law, and (2) an unredacted copy of the Reply Memorandum of Law under seal. Should the Court determine that the underlying documents referenced above should not be kept under seal in their entirety, Mr. Larsen respectfully requests an opportunity to propose more limited redactions to his Reply Memorandum of Law.

Dated: June 4, 2021  
New York, NY

Respectfully Submitted,

/s/ Martin Flumenbaum  
Martin Flumenbaum  
*Counsel for Defendant Christian A. Larsen*

cc: All Counsel (via ECF)